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July 14, 2022

**Via Email (Chambers of Judge Mitchell S. Goldberg@paed.uscourts.gov)**


The Honorable Mitchell S. Goldberg  
United States District Court  
Eastern District of Pennsylvania  
James A. Byrne U.S. Courthouse, Room 7614  
601 Market Street  
Philadelphia, Pennsylvania 19106-1797

Re: USA v. Warren et al., Case #: 2:21-cv-04511-MSG

Dear Judge Goldberg:

This letter follows up my letter of yesterday to briefly explain that the Answer filed here was factually and legally substantiated. While we lacked the Defendants' cooperation recently, we had received a certain amount of cooperation earlier in this matter and the Answer was able to be prepared and filed based on that earlier cooperation. Still, the Answer would have done more to make specific and informed denials had the Defendants been cooperating recently. With proper recent cooperation the Answer would have been better and more helpful to the Defendants, but with what information we had from earlier cooperation an Answer that was sufficient (but not as good as it could have been) was able to be filed. As always, the undersigned can provide further information as helpful to the Court.

Respectfully submitted,

  
Brem Moldovsky, Esq.  
Brem Moldovsky, L.L.C.  
Attorney for Defendants

cc: Counsel of Record  
Timothy Warren and Titan Medical Compliance (doctimm@titanmedcenter.com)